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July 1, 2016

Via ECF

Hon. P. Kevin Castel
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Bahr v. PNW Enterprises, LLC d/b/a New York Kids Club*

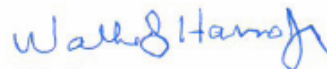
Dear Judge Castel:

We represent Plaintiff in the above-referenced matter and write on behalf of both Parties. We write respectfully requesting an extension of initial disclosures to July 15, 2016 and an extension of interrogatories and initial requests for production of documents to July 29, 2016. Initial disclosures were previously scheduled for June 2, 2016, and interrogatories and initial requests for production of documents were previously scheduled for June 27, 2016. This request will not affect any other deadlines in the scheduling order.

This is the parties' fourth request for extension or adjournment: on March 21, 2016, Defendant requested an extension of time for Defendant to respond to the Complaint; on March 22, 2016, the parties requested an adjournment of the initial conference; and on April 6, 2016, the parties requested an extension of time for the Parties to file their joint letter. The Court granted all requests.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

cc: Lloyd J. Weinstein (via ECF)